

REMARKS

Claims 1-23 remain pending in the application.

Abstract Objection

The Examiner objected to Applicants' Abstract as allegedly being unnecessarily long.

Applicants respectfully request that the originally filed Abstract be canceled and replaced with the Abstract attached hereto. The Applicants respectfully request the object of the Applicants' Abstract be withdrawn.

Claims 1-23 over BLUETOOTH Specification

In the Office Action, claims 1-5, 8-10, 13-15, 18 and 20-23 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by BLUETOOTH Specification Version 1.0 B, Cordless Telephony Profile and CORE Channel control section 10.9 Scatternet ("BLUETOOTH Specification"), with claims 6, 7, 11, 12, 16, 17 and 19 rejected under 35 U.S.C. §103(a) as allegedly being obvious over BLUETOOTH Specification. The Applicant respectfully traverses the rejection.

Claims 1-7 recite a cellular telephone comprising a cordless telephone PSTN gateway role. Claims 8-15 recite establishing a piconet network comprising a cellular telephone and a remote telephone piconet device in direct communication. Claims 18-23 passing incoming call related information from a cellular telephone receiving an incoming call directly to a remote telephone piconet device over a wireless piconet.

The Examiner alleged that BLUETOOTH Specification discloses a cellular telephone comprising a cordless telephone PSTN gateway role and direct communications between a cordless telephone and a remote telephone piconet device (see Office Action, page 3 and 4). The Applicants respectfully disagree.

BLUETOOTH Specification discloses a Gateway that acts as a terminal endpoint from an external network point and handles all interworking

towards that network (see page 104). Thus, BLUETOOTH Specification discloses use of an intermediate Gateway to handle all interworking towards a network, not disclosing or suggesting a cellular telephone comprising a cordless telephone PSTN gateway role and direct communications between a cellular telephone and a remote telephone piconet device, as recited by claims 1-23.

Moreover, claims 1-7 recite a cordless telephone PSTN gateway role that allows a remote telephone piconet device to answer an incoming call to a cellular telephone over a piconet network. Claims 8-23 recite routing an incoming call to a cellular telephone over a piconet to another telephone device.

The Examiner alleged that BLUETOOTH Specification discloses a remote telephone piconet device to answer an incoming call to a cellular telephone over a piconet network and routing an incoming call to a cellular telephone over a piconet to another telephone device (see Office Action, pages 3 and 4). The Applicants respectfully disagree.

BLUETOOTH Specification discloses a Gateway that supports multiple terminals being active at once (see page 104). "Connecting to the gateway so that incoming calls can be routed to the TL and outgoing calls can be originated." (see BLUETOOTH Specification, page 105). Thus, BLUETOOTH Specification discloses use of a Gateway to allow incoming calls to be routed to a terminal, however fails to disclose routing of calls from one Bluetooth device to another Bluetooth device, much less disclose or suggest a remote telephone piconet device to answer an incoming call to a cellular telephone over a piconet network and routing an incoming call to a cellular telephone over a piconet to another telephone device, as recited by claims 1-23.

Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." *Studiengesellschaft Kohle mbH v. Dart Industries, Inc.*, 549 F. Supp.

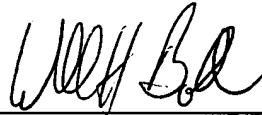
716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

Accordingly, for at least all the above reasons, claims 1-23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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